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February 18, 2025

**VIA ECF**

The Honorable Philip M. Halpern  
United States District Judge  
United States District Court for the Southern District of New York  
300 Quarropas St.  
White Plains, NY 10601

Re: Chun-Ko Chang. v. Shen Yun Performing Arts, Inc., et al., Case No. 24-cv-8980

Dear Judge Halpern:

We are counsel to Defendant International Bank of Chicago (“IBC”) in the above-captioned matter. We write on behalf of the parties in the above matter to jointly request an extension of time for Plaintiff to file an amended complaint from February 19, 2025 to March 5, 2025 and to extend the deadline for all Defendants to respond to the amended complaint to March 31, 2025. Currently, IBC’s deadline to respond to the Complaint is February 19, 2025 [ECF No. 29]. The remaining Defendants (with the exclusion of IBC), have until March 21, 2025 to respond to the Complaint. [ECF No. 56.]

Pursuant to Rule 4(c)(ii) of Your Honor’s Individual Practices in Civil Cases, on February 10, 2025, IBC served Plaintiff with a letter outlining specific pleading deficiencies in the Complaint with controlling authority that IBC contends would warrant dismissal of the Complaint as to IBC. On February 17, 2025, Plaintiff served a responsive letter supporting the Complaint as filed but also stating Plaintiff’s intention to amend the Complaint.

The parties believe that this extension could avoid unnecessary motion practice.

Thank you for your consideration of this matter.

Respectfully submitted,

/s/ Felicia S. Ennis

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